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PUBLIC INSTRUCTION

STATE GUIDANCE

To: CACFP Sponsoring Organization
From: Sally Bartlett, MAOL, GWC, Specialist
Date: January 26, 2006
Subject: Sponsor Monitoring of the Child and Adult Care Food Program (CACFP)
Policy Memo CACFP-06-03

It has come to our attention that there is some uncertainty regarding proper application of the monitoring requirements for sponsoring organizations set forth at § 226.16(d) of the CACFP regulations. Specifically, we have been asked to clarify whether the regulations require that, when sponsors have facilities claiming breakfasts, suppers, post-supper snacks, or weekend meals, it is necessary for the sponsor to monitor each of these meal services. This memorandum provides guidance on that issue.

The introductory paragraph of § 226.16(d) states that, "Each sponsoring organization must provide adequate supervisory and operational personnel for the effective management and monitoring of the program at all facilities it sponsors." In order to meet this requirement, a sponsoring organization with facilities claiming breakfasts, suppers, post-supper snacks, or weekend meals must provide oversight of all types of meal services being claimed by its facilities. Monitoring all meal service types is the only meaningful way for sponsors to ensure that Program requirements are being met, and that their facilities are accurately claiming meals for each type of meal service they provide.

It is important to clarify that the requirement to "monitor all meal service types" does not require a sponsor to annually conduct reviews of all of the meal services being claimed at each facility. As long as, in the total of all reviews it conducts, the sponsor provides oversight of all meal services being claimed, the sponsor has met its responsibilities.

It is also important to clarify that the phrase "oversight of all types of meal services" does not require a sponsor to conduct the same percentage of reviews during the various meal services as the percentage of each meal service claimed during the previous year. That is, if five (5) percent of the meals claimed in the prior year by a sponsor of 500 homes were suppers, it would not be necessary for the sponsor to conduct exactly 5 percent of this year's reviews during the supper meal service. However, the percentage of all reviews conducted by the sponsor should be roughly proportional to the percentage of each type of meal being claimed by its facilities. In addition to conducting full, onsite facility reviews, a sponsor might also provide oversight by conducting more household contacts in facilities serving breakfasts, suppers, or weekend meals, in order to have parents verify their children's attendance at these meal services.

Finally, it is important to emphasize that a facility review conducted during the indicated meal service time for breakfast, supper, or a weekend meal need not always include the actual observation of a meal service. For example, if the provider was scheduled to serve supper between 6:00 PM and 7:30 PM, the monitor could arrive at 5:45 PM and complete her review of the provider's records by 6:30 PM. Regardless of whether the monitor observed the actual service of supper, she would know whether the usual number of children being claimed for supper was present at 5:45 PM and at 6:30 PM. Thus, the sponsor can decide whether it wishes to use these reviews to meet the regulatory requirement that, for each facility, at least one review each year must be an unannounced review of a meal service.

To assess a sponsor's compliance with these requirements, a State agency (SA) must, during its review of a sponsor, determine whether the sponsor has made a reasonable effort to monitor all of the meal services being claimed by its facilities. For SAs, as for sponsors, conducting household contacts in sampled facilities claiming suppers or breakfasts might be an especially effective way to determine whether a facility is accurately reporting its meal counts for each meal service. If the SA determines that the sponsor has failed to manage and monitor all Program operations, it would be a serious deficiency under § 226.6(c)(3)(ii)(C) and (O). The SA might also wish to supplement these onsite review efforts with a requirement that sponsors address in the management plan their approach to ensuring that all types of meal services being claimed for Program reimbursement by its facilities will be adequately monitored.

For further information call the Child Nutrition Division at 208-332-6821